From: GROUP DALLAS-TAT
To: R6DAL01.R6TOXLAN(BLACK-BRENDA),R6DAL02.R6HAZRD1(BR...
Date: 8/13/97 7:45am
Subject: Odessa Drum Company

POLREP NO: 5 (Odessa Drum Company- Soil, REMOVAL) RV2

Date: August 13, 1997
Subject: Odessa Drum Company
From: Greg Fife, OSC, U.S. EPA, Region VI, ERB (214/665-2270)
To: Director, ERD
Charles A. Gazda, Chief, ERB, Region VI
State Contact: TNRCC

Site ID#: Z2
FPN No: Not Applicable
Response Authority: CERCLA
NPL Status: Non NPL
State Notification: TNRCC
Incident Category:
Inactive Drum Recycling Facility
Action Memorandum Status:
Signed: July 11, 1994

CERCLIS No: TXD008012254
Delivery Order No:001606-013
ERNS No:Not Applicable
Action Lead:EPA Lead,PRP Funded
Start Date: Jan. 9, 1997
Soil Start Date: 8/5/97
Completion Date:
Event Qualifier: TC

I. SITUATION INFORMATION

A. Site description

The Odessa Drum Company is an inactive and abandoned drum recycling facility located in Odessa, Ector County, Texas. Geographic coordinates of the site are 3135" North Latitude and 10205" West longitude. The site encompasses approximately 9.7 acres and is located at 2214 Alice Street, just outside the Odessa City limits. ODC has been divided into two tracts of land: Tract 1 encompasses approximately 4.8 acres and is located north of Alice Street. Reconditioning and storage of reconditioned drums occurred on Tract 1. Tract 2 encompasses 4.9 acres and is located north of Judy Street. Drums containing waste material were temporarily stored in Tract 2. The facility was operated by Mr. Charles Harris, who ceased operations and abandoned the site in February 1990 after being fined by the Texas Water Commission (TWC), now known as the Texas

Natural Resource Conservation Commission or TNRCC, for failure to properly manage the on-site generated hazardous waste. Due to the failure of ODC to pay for the fines leveled against it by the TWC, the TWC notified the EPA of its potential for bankruptcy in 1989.

B. Description of threat

The ODC site is located within a residential and light industrial area. The nearest residents are located within 50 feet of the ODC property on the west and north sides of the facility. The facility is completely fenced and kept

locked 24 hours per day. Approximately 1,000 residents live within a 1-mile radius of the site. The primary threat at the ODC site appears to be the airborne migration of contaminated surface soils. The pesticides DDT, DDD and DDE, and metals, chromium and lead, have been detected in the surface soils at concentrations greater than the TNRCC Texas Risk Reduction Standards (TxRRS) the detected concentrations did not exceed the TxRSS for those compounds.

C. Removal Assessment Results

During the week of March 17, 1996, the START conducted surface soil sampling as part of the removal assessment. A total of 86 composite samples were collected from Tract 1 and seven grab samples were collected from Tract 2. The samples were analyzed for TCL volatile and semi-volatile organics and TAL inorganics. In addition, eight of the samples were analyzed for TCL pesticides and polychlorinated biphenyl's (PCBs). Chemical analyses of the samples indicated the presence of contamination in 19 of the grid quadrangles. Organic and inorganic analytical results were compared to the TxRRS for concentrations in soil protective of human health in residential areas. Eight grids contained lead and five grids contained chromium in concentrations that exceeded the TxRRS for those analytes. Pentachlorophenol (PCP) was detected in a concentration that exceeded the TxRRS for PCP in one grid quadrangle. The TXRRS's for DDT, DDD, DDE, Dieldrin and Aldrin were exceeded in several of the grid quadrangles located adjacent to the building. Several volatile and semi-volatile organic compounds were detected within some of the sampled grid

quadrangles; however, the detected concentrations did not exceed the TxRRS for those compounds.

D. Site History/Background

Historical actions taken: ODC began operations in 1962 and operated until 1990. The facility received waste chemical drums from various industries including chemical plants and oil field service companies. Contents of the drums were drained into drums or tanks for storage and the emptied drums were then cleaned, integrity tested, painted and sold as reconditioned drums. The TWC referred the site to the EPA-Emergency Response Branch (EPA-ERB) after the issuing of fines to the operator for RCRA violations. In April 1990, the EPA and TAT conducted an assessment of the drums and tanks at the site. It was noted that drums were leaking, there was the presence of stained soil and areas void of vegetation. Chemical analysis of a surface soil sample indicated the presence of volatile, semi-volatile organic compounds and heavy metals.

From August 1990 til July 1991, the EPA conducted removal actions at the site. Approximately 4,600 drums and six large above ground storage tanks were inventoried, staged, sampled, hazard categorized and their contents properly disposed.

In January 1995, EPA-ERB initiated Phase I of a three-part removal action at the site. Phase I consisted of the removal of 72,000 drums and their contents and was concluded in December 1995. Phase II, surface soil extent of contamination survey, was initiated in March 1996. Analytical results indicated the presence of contamination in 19 of the grids.

Phase III is the excavation and backfilling of the contaminated grids. This was initiated on august 4, 1997.

II. SITE INFORMATION

Site Activities to Date: An initial "walk-through" inspection was conducted at ODC on 7/21-22/97 by the EPA-TM, the ERRS Remedial Manager and the START Project Manager. The ERRS contractor, CET, mobilized to the site the week of July 28, 1997 to began preparations for the soil excavation. The ERRS established a command post, rented the various heavy equipment needed for the excavation and constructed the Containment Cell for the temporary storage of the non-hazardous and hazardous surface soils. During the week of August 4, 1997, EPA-TM and the START PM mobilized to the site. ERRS began to excavate and unload the contaminated surface soil from Grid L-4 into the Containment Area on August 5, 1997.

From August 6 to August 13, 1997, ERRS completed the excavation of seven grids. All excavated soil was transported to the Containment Area and placed into the appropriate containment cell until off-site disposal could be arranged. Approximately 512 yards have been excavated from the seven grids (D4, D5, D6, E5, F2, F3/G3, K7 and L4). Due to the amount of soil excavated, ERRS began enlarging the Containment Area. ERRS has backfilled one grid area (L4) with clean soil.

On August 11, 1997, START collected three surface soil verification samples from grids F2, D6 and K7 and shipped the samples to Specialty Assays located in Nashville, Tennessee. The samples will be analyzed for volatile organic compounds, semi-volatile organic compounds, pesticides/polychlorinated biphenyls (PCBs), chromium, lead and mercury.

On August 12, 1997, representatives from Chem-Waste Management, Incinerator Division arrived at the site to determine what type of data would be needed to arrange for the off-site disposal of the contaminated soil.

B. Next Steps: ERRS will continue to excavate and transport contaminated soil to the Containment Area. The excavated grids will be backfilled with clean soil. ERRS will begin to arrange for the off-site disposal of the contaminated soil. Representatives from Laidlaw will arrive at the site

to determine the data needed for the off-site disposal of the contaminated soil. ERRS will procure a laboratory for the waste profile/disposal samples. START will continue to provide technical assistance to the EPA-TM, conduct contractor monitoring and collect surface soil samples for waste profiling and verification.

C. Key Issues: None at this time.

III. PROPOSED ACTIONS

The excavation, backfilling and off-site disposal of the contaminated surface soils. START will collect surface soil samples from selected excavated grids and ship the samples for chemical analyses.

START PM: Steve Cowan